

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Civil File No.: 14-CV-2110 (PAM/TNL)

The Painters and Allied Trades District Council No. 82 Health Care Fund, the Painters and Allied Trades District Council No. 82 Vacation Fund, the Painters and Allied Trades District Council 82 STAR Fund, the International Painters and Allied Trades Industry Pension Fund, the Minneapolis Local 386 Drywall Finishing Industry Pension Fund, the Minnesota Finishing Trades Training Fund, the National Painting, Decorating, and Drywall Apprenticeship Committee, and the St. Paul Painting Industry Pension Fund, and their Trustees and successors,

Plaintiffs,

vs.

LICO'S Drywall LLC and Federico Flores Torres, individually,

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Christy E. Lawrie, being first duly sworn on oath, deposes and states as follows:

1. This Affidavit of made to supplement my previous Affidavit in the above-entitled matter dated May 5, 2015 and filed with the Court as Docket No. 42. I have personal knowledge of the facts set forth herein.

**SUPPLEMENTAL
AFFIDAVIT OF
CHRISTY E. LAWRIE**

2. The Plaintiffs' Motion for Entry of Judgment inadvertently only included page one of the Audit Invoice. Attached hereto as Exhibit A is a full, true, and complete copy of the Audit Invoice.

3. Attached hereto as Exhibit B are true and correct copies of certified payroll reports for projects worked during the Audit Period for which Torres is indicated as performing covered work.

4. Attached hereto as Exhibit C are true and correct copies of timecards produced by the Defendants which indicate that Torres performed and supervised the performance of covered work.

5. Attached hereto as Exhibit D are true and correct copies of 1099s produced by the Defendants during discovery.

6. Despite requests from the Trustees, the Defendants did not produce any other business records relating to any of these subcontracts.

7. For one of the subcontractors, Top Brush Painting, the Defendants submitted an affidavit from the owner of Top Brush Painting setting forth the type of work performed by Top Brush Painting for Defendant LICO's Drywall.

8. The Trustees determined that the work performed by Top Brush Painting was not covered by the CBA and removed the hours from the Audit Invoice.

9. This Affidavit is made in support of Plaintiffs' Motion for Entry of Judgment.

FURTHER YOUR AFFIANT SAITH NOT.

s/ Christy E. Lawrie

Christy E. Lawrie

Subscribed and sworn to before me
this 27th day of May, 2015.

s/ Nicole M. Horton

Notary Public

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